



# Industrial Waste Program 14-Day Report for Discharge or Permit Violation

Exhibit No. 23

For more information on reporting requirements, refer to your Permit, Section S4.D. If you have a Major/Minor Discharge Authorization, refer to General Condition D.

<b>Date:</b> 7-1-2019	<b>Permit/Authorization number:</b> 7595-06
<b>Company/Agency name:</b> Rabanco Recycling, Republic Services	
<b>Sample site number:</b> A43406	
<b>1. Description and cause of noncompliance event:</b> (Include dates, times, locations, sample results, and estimated gallons discharged)  In February of 2018, Rabanco Recycling stopped using time proportional sampling at the facility due to an issue with the meter readings. Hand composite samples were collected for oil and grease, however a grab samples were collected for zinc, copper, and lead.	
<b>2. Date and time King County notified:</b> (Requirement is within 24 hours of learning of violation unless event was spill or slug discharge then must have notified immediately)  During a call with King County in March of 2019, it was realized that metal samples were being collected in correctly and composite samples needed to be collected.	
<b>3. Corrective actions taken to respond to the violation and ensure ongoing compliance:</b>  In March 2019, time composite sampling was set up at the facility using a sampler that composites 24 hours of flow.	
<b>4. If discharge violation, enter follow-up sample collection date and results:</b> (May use subsequent self-monitoring sample if collected and analyzed within 14 days of learning of violation)	
<b>Additional sheets attached:</b> <input type="checkbox"/> YES or <input checked="" type="checkbox"/> NO	
<i>I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>	
<b>Signature:</b>	
<b>Name:</b> Megan Darrow	
<b>Date:</b> 7-1-2019	
<b>Title:</b> Environmental Specialist	
<b>Person signing above is:</b> (choose one) <input type="checkbox"/> Authorized Representative <input checked="" type="checkbox"/> Delegated Authorized Representative*	

**Please return this form and attachments to:**

King County Industrial Waste Program  
201 S. Jackson Street, Suite 513, Seattle, WA 98104-3855  
Fax: 206-263-3001  
Email: [info.KCIW@kingcounty.gov](mailto:info.KCIW@kingcounty.gov)

RAB001108



## **Industrial Waste Program 14-Day Report for Discharge or Permit Violation**

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<b>Date:</b> April 24, 2017	<b>Permit/Authorization number:</b> 7595-06
<b>Company/Agency name:</b> Republic Services, Rabanco Recycling Center	
<b>Sample site number:</b> A43406	
<b>1. Description and cause of noncompliance event:</b> (Include dates, times, locations, sample results, and estimated gallons discharged) <p>The lead results of Rabanco's sampling on February 20, 2017 calculated to 1.38 lbs/day; the permit allows a mass load of 0.573 lbs/day permit the facility's discharge permit. Due to the fact that the result for lead was above the allowed discharge limit for lead, the facility has conducted an evaluation to determine possible sources leading to the elevated pollutant load.</p> <p>It was determined that possible lead sources could be either contaminated soils or CDL material that is brought to the facility for disposal. Rabanco recycling was also informed that a mobile repair operation was evicted from the property adjacent to the facility's south east property boundary. The mobile repair operations was not permitted and the city of Seattle caught the business dumping vehicle fluids into drains adjacent to the property.</p> <p>In addition to the two possible causes documented above, it is also possible that the flow meter installed in the facility's sewer line is incorrectly metering flow through the pipe. During the April sampling event, it was observed that there currently is a build up of sediment in the pipe. When buildup of sediments occur in the pipe, the water meter's laser cannot distinguish between sediment and water, calculating the depth of both a water.</p>	
<b>2. Date and time King County notified:</b> (Requirement is within 24 hours of learning of violation unless event was spill or slug discharge then must have notified immediately) <p>King County notified Rabanco Recycling through an email on 3/30/17.</p>	
<b>3. Corrective actions taken to respond to the violation and ensure ongoing compliance:</b> <p>The facility Supervisors are currently working with on-site personnel to ensure proper operations are being implemented at the facility regarding handling of soils and CDL material. The facility will continue to monitor both operations to ensure proper handling of materials are conducted and best management practices are being implemented and maintained at all times.</p> <p>The facility will be performing cleaning of the sewer line to remove any materials that may be contributing to the elevated levels of lead found during sampling. It will also allow the facility to evaluate whether the sediment collecting in the pipe is contributing to assumed flow by reviewing flow data from the laser meter after the maintenance is performed.</p> <p>A regular maintenance schedule to clean out sediment in the sewer line will be implemented and maintained at the facility.</p>	

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RAB001110



## Industrial Waste Program 14-Day Report for Discharge or Permit Violation

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**4. If discharge violation, enter follow-up sample collection date and results:** (May use subsequent self-monitoring sample if collected and analyzed within 14 days of learning of violation)

A follow up collection of sampling was conducted on 4/10/17. Flow data will be downloaded and Rabanco will calculate the lbs per day of lead.

**Additional sheets attached:** ☐ YES or ☒ NO

*I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

**Signature:**

**Name:** Rich McClurg

**Date:** 4/24/17

**Title:** Maintenance Supervisor

**Person signing above is:** (choose one) ☐ Authorized Representative  
☒ Delegated Authorized Representative\*

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RAB001111



# Industrial Waste Program 14-Day Report for Discharge or Permit Violation

Exhibit No. 23

For more information on reporting requirements, refer to your Permit, Section S4.D. If you have a Major/Minor Discharge Authorization, refer to General Condition D.

<b>Date:</b> April 14, 2017	<b>Permit/Authorization number:</b> 7595-06
<b>Company/Agency name:</b> Republic Services, Rabanco Recycling Center	
<b>Sample site number:</b> A43406	
<b>1. Description and cause of noncompliance event:</b> (Include dates, times, locations, sample results, and estimated gallons discharged)  When filling out the March 2017 SMR, it was discovered that Rabanco's daily flow volume for March 11, 2017 was above the allowed daily discharge limit stipuated in the facility's permit. The facility discharge for the 11 <sup>th</sup> was 256,827 gallons; the daily discharge allowed is 244,500 gallons/day.	
<b>2. Date and time King County notified:</b> (Requirement is within 24 hours of learning of violation unless event was spill or slug discharge then must have notified immediately)  Rabanco notified King County through a phone call and upon submittal of the March SMR on 4/13/2017.	
<b>3. Corrective actions taken to respond to the violation and ensure ongoing compliance:</b>  The facility has scheduled a deep cleaning of the sewer system to remove all fines in the sewer line. The facility has reached out to a consultant and determined that the silt currently in the bottom of the pipe may be causing the laser meter to inaccurately record daily flow. The meter is calculating the silt as water flow based upon the fact that it is metering heighth of material in the pipe and cannot differentiate between silt and water.	
<b>4. If discharge violation, enter follow-up sample collection date and results:</b> (May use subsequent self-monitoring sample if collected and analyzed within 14 days of learning of violation)  Once the pipes are fully cleaned, the discharge volume will be downloaded and reviewed to determine if the daily flow metered has decreased. A follow up with county will be conducted to determine if the issue is resolved or futher investigation is required.	
<b>Additional sheets attached:</b> <input type="checkbox"/> YES or <input checked="" type="checkbox"/> NO	
<i>I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>	
<b>Signature:</b>	
<b>Name:</b> Rich McClurg	
<b>Date:</b> 4/13/17	

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RAB001112



# Industrial Waste Program 14-Day Report for Discharge or Permit Violation

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**Title:** Maintenance Supervisor

**Person signing above is:** (choose one) ☐ Authorized Representative  
☒ Delegated Authorized Representative\*

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RAB001113



# Industrial Waste Program 14-Day Report for Discharge or Permit Violation

Exhibit No. 23

For more information on reporting requirements, refer to your Permit, Section S4.D. If you have a Major/Minor Discharge Authorization, refer to General Condition D.

<b>Date:</b> April 7, 2017	<b>Permit/Authorization number:</b> 7595-06
<b>Company/Agency name:</b> Republic Services, Rabanco Recycling Center	
<b>Sample site number:</b> A43406	
<b>1. Description and cause of noncompliance event:</b> (Include dates, times, locations, sample results, and estimated gallons discharged)  The lead results of of King County's sampling on March 9, 2017 calculated to 0.57 lbs/day; the permit allows a mass load of 0.573 lbs/day permit the facility's discharge permit. Due to the fact that the result for lead was so close to the allowed discharge limit for lead, the facility has conducted an evaluation to determine possible sources leading to the elevated pollutant load.  It was determined that possible lead sources could be either contaminated soils or CDL material that is brought to the facility for disposal. Rabanco recycling was also informed that a mobile repair operation was evicted from the property adjacent to the facility's south east property boundary. The mobile repair operations was not permitted and the city of Seattle caught the business dumping vehicle fluids into drains adjacent to the property.	
<b>2. Date and time King County notified:</b> (Requirement is within 24 hours of learning of violation unless event was spill or slug discharge then must have notified immediately)  King County notified Rabanco Recycling through a warning letter on 3/30/17.	
<b>3. Corrective actions taken to respond to the violation and ensure ongoing compliance:</b>  The facility Supervisors are currently working with on-site personnel to ensure proper operations are being implemented at the facility regarding handling of soils and CDL material. The facility will continue to monitor both operations to ensure proper handling of materials are conducted and best management practices are being implemented and maintained at all times.  The facility will be performing cleaning of the sewer line to remove any materials that may be contributing to the elevated leves of lead found during sampling.  Sampling of the sewerline will occur on 4/10/17 and once results are available, they will be reported to the county.	
<b>4. If discharge violation, enter follow-up sample collection date and results:</b> (May use subsequent self-monitoring sample if collected and analyzed within 14 days of learning of violation)	
<b>Additional sheets attached:</b> <input type="checkbox"/> YES or <input checked="" type="checkbox"/> NO	

*I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system,*

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RAB001114



## Industrial Waste Program 14-Day Report for Discharge or Permit Violation

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*or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

**Signature:**

**Name:** Rich McClurg

**Date:** 4/7/17

**Title:** Maintenance Supervisor

**Person signing above is:** (choose one) ☐ Authorized Representative  
☒ Delegated Authorized Representative\*

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RAB001115





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<b>Date:</b> 3-25-2019	<b>Permit/Authorization number:</b> 7595-06
<b>Company/Agency name:</b> Rabanco Recycling, Republic Services	
<b>Sample site number:</b> A43406	
<b>1. Description and cause of noncompliance event:</b> (Include dates, times, locations, sample results, and estimated gallons discharged)  During the facility's January sampling event, the lead loading in the sample caused a daily concentration average that was over the allowed discharge amount. Historically, the facility has not been verifying these numbers prior to submitting the monthly SMR. Through follow-up discussion with the facility's inspector, it was realized that during sampling events, the metals collection was done through a grab sample and should be done as a composite sample. This was an oversight by the facility when the method of collecting samples changed in May of 2018.	
<b>2. Date and time King County notified:</b> (Requirement is within 24 hours of learning of violation unless event was spill or slug discharge then must have notified immediately)  Our Inspector notified the facility of the issue on 3-18-19.	
<b>3. Corrective actions taken to respond to the violation and ensure ongoing compliance:</b>  Moving forward the facility will review the sampling values and use the equation provided by the county to determine whether the daily concentration of each parameter is under the allowed limit. This will ensure that the facility learns of any concentrations that are above the allowed limit as well as ensure that the high levels will be documented and realized sooner. Additionally, the facility has corrected the issue with the sampling equipment and will now be conducting 24 hour time composite sampling moving forward instead of hand composite sampling and grab sampling.	
<b>4. If discharge violation, enter follow-up sample collection date and results:</b> (May use subsequent self-monitoring sample if collected and analyzed within 14 days of learning of violation)  Collection of samples occurred on 3/25 and 3/26 of March. Samples will be reported once analytics are back from the lab.	
<b>Additional sheets attached:</b> <input type="checkbox"/> YES or <input checked="" type="checkbox"/> NO	
<i>I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>	
<b>Signature:</b>	

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RAB001116



# Industrial Waste Program 14-Day Report for Discharge or Permit Violation

Exhibit No. 23

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**Name:** Megan Darrow

**Date:** 3-28-2019

**Title:** Environmental Specialist

**Person signing above is:** (choose one) ☐ Authorized Representative  
☒ Delegated Authorized Representative\*

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RAB001117



# Industrial Waste Program 14-Day Report for Discharge or Permit Violation

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<b>Date:</b> September 27, 2016	<b>Permit/Authorization number:</b> 7595-06
<b>Company/Agency name:</b> Republic Services, Rabanco Recycling Center	
<b>Sample site number:</b> A43406	
<b>1. Description and cause of noncompliance event:</b> (Include dates, times, locations, sample results, and estimated gallons discharged)  The results of our August analysis at the permitted facility were higher than the authorized discharge benchmark for zinc. Our August analysis result was 8.1mg/L; our permit authorizes a benchmark of 5.0 mg/L. The cause of the elevated sample result is believe to have been the result of sampling during low flow occurrence resulting in a more concentrated sewer sample. Due to lack of volume flowing through the pipe, it was visually clear that the sample contained a heavier concentration of fines.	
<b>2. Date and time King County notified:</b> (Requirement is within 24 hours of learning of violation unless event was spill or slug discharge then must have notified immediately)  9/15/2016	
<b>3. Corrective actions taken to respond to the violation and ensure ongoing compliance:</b>  The sample collected in August was taken during a time of low flow. The facility experienced very little rainfall in the month of August; we believe the sample collected was more concentrated with fines than a typical sewer water collection. In addition, we have conducted an evaluation of operations at the facility to determine if any facility operations may have contributed to the higher level of zinc found in the sewer water sample. We were unable to determine any activities that may have caused the elevated sample result. We will be conducting a second round of sampling on 9/29/16 to see if our zinc levels fall below the benchmark. We will perform maintenance to the sewer pipe to ensure the pipe is clear of residual fines as much as possible. The facility is on a quarterly and as-needed maintenace schedule.	
<b>4. If discharge violation, enter follow-up sample collection date and results:</b> (May use subsequent self-monitoring sample if collected and analyzed within 14 days of learning of violation)  9/29/2016 - The sample results will be turned into King County as soon as they are available.	
<b>Additional sheets attached:</b> <input type="checkbox"/> YES or <input checked="" type="checkbox"/> NO	
<i>I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>	
<b>Signature:</b>	

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RAB001118



## Industrial Waste Program 14-Day Report for Discharge or Permit Violation

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**Name:** Rich McClurg

**Date:** 9/28/2016

**Title:** Maintenance Supervisor

**Person signing above is:** (choose one) ☐ Authorized Representative  
☒ Delegated Authorized Representative\*

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RAB001119